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FCC, President, Congress taking the right steps toward Broadband policy

- ➡ **FCC action with regard to broadband in the TRO has produced compelling results**
 - Increased deployment of broadband services
 - Announcements of significant expected additional investments
- ➡ **Industry acquisitions reflect growing confidence in broadband access segment**
- ➡ **Consistent with President Bush and Congressional Democrats and Republicans, prompt availability of broadband services to all Americans is imperative**



Minor, but Important, Clarification to TRO Needed

- ➡ **BellSouth's Petition for Reconsideration highlighted some aspects of the TRO needing clarification**
 - i.e. equal treatment of FTTC with FTTH in greenfield applications
- ➡ **BellSouth, SBC, Verizon defined “Fiber-to-the-Premises”, or FTTP, to include FTTH and FTTC**
- ➡ **Other industry groups, such as the Broadband High-Tech Coalition, also support equal treatment**



FTTC Should be Treated Identical to FTTH in Greenfield Situations

- ➡ **FTTC, FTTH and Fiber-to-the-MDU all support the same services (voice, video, data – 100Mb/s and beyond)**
- ➡ **Each incorporate some copper and coax**
- ➡ **Each satisfy competitive impairment standard**
- ➡ **“Bright Line” standard can be preserved – up to 500 feet of metallic media should be allowed between fiber termination and network demarc**
 - Same CPE and CPE interfaces for each loop type; same medium between CPE and fiber termination
 - Loop administration and inventory tools can readily identify loop types



The Commission should remain technology neutral

➡ Both FTTC and FTTH:

- Are service equivalent architectures
- Comply with the section 706 goals
- Meet the competitive impairment standard

➡ The choice of architecture should be based on engineering and economic criteria

- Powering
- Bandwidth Sharing
- Electronic Points of Failure

➡ Deployment decisions should not be based on arbitrary regulatory distinctions



Network Engineering Differences (FTTC vs. FTTH)

➡ Powering

- Network powering vs. home powering
- Centralized battery backup vs. distributed batteries
- Service provider ownership and management vs. customer owned and managed

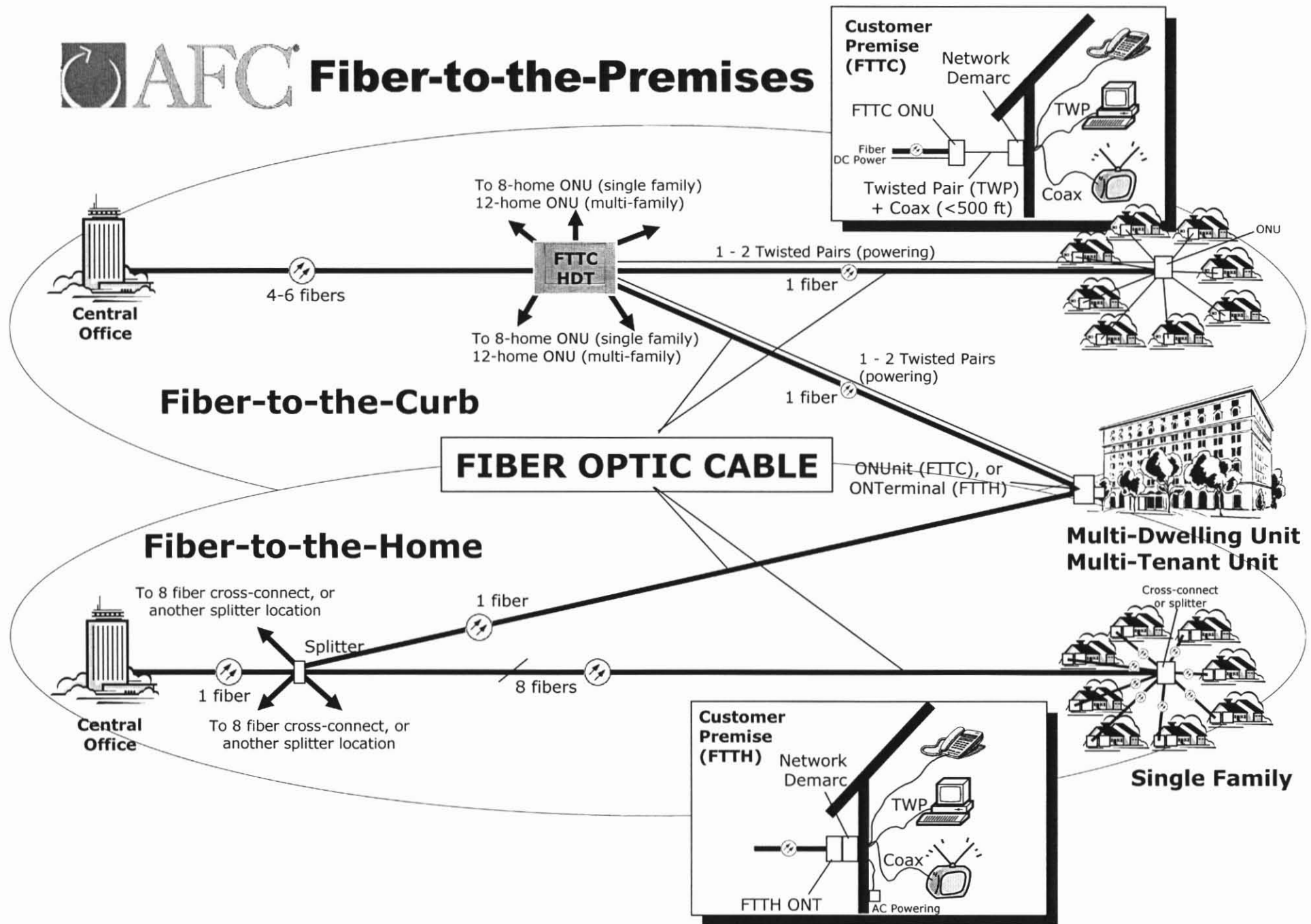
➡ Bandwidth Sharing

- One fiber shared by 8 - 12 homes vs. one fiber shared by 32 homes

➡ Electronic Points of Failure

- O/E and powering conversion shared by 8-12 users vs. O/E, powering dedicated, and replicated, for every user

AFC Fiber-to-the-Premises

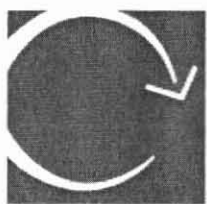


The Acronym for Access™



Summary

- **AFC has a broad product line allowing carriers to choose the best solution for the circumstances**
 - FTTH
 - FTTC
 - FTTBuilding
- **FTTH is economically and technically challenging in some situations . . . the same applications in which FTTC may be attractive**
- **Advanced services may not be deployed “to all Americans” based on disparate regulatory treatment of FTTC and FTTH**



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